

1 Keith Altman (SBN 257309)  
2 The Law Office of Keith Altman  
3 33228 West 12 Mile Road, Suite 375  
4 Farmington Hills, Michigan 48334  
5 Telephone: (248) 987-8929  
6 keithaltman@kaltmanlaw.com  
7 *Attorneys for Plaintiffs*

8 Meng Jia Yang (SBN 311859)  
9 Wilson Sonsini Goodrich & Rosati  
10 650 Page Mill Road Palo Alto, CA 94304-1050  
11 Telephone: (650) 493-9300  
12 mjyang@wsgr.com  
13 *Attorneys for Defendant*

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN JOSE DIVISION**

	) 5:21-CV-00570-BLF
	)
18 <b>AMBASSADOR MARC</b>	)
19 <b>GINSBERG and COALITION FOR</b>	) <b>JOINT STIPULATION AND</b>
20 <b>A SAFER WEB,</b>	) <b>[PROPOSED] ORDER TO</b>
	) <b>CONTINUE THE HEARING</b>
21 <b>Plaintiffs,</b>	) <b>ON DEFENDANT'S MOTION</b>
	) <b>TO DISMISS</b>
22 <b>v.</b>	)
23	)
24 <b>GOOGLE LLC,</b>	) Judge Beth Labson Freeman
	)
25 <b>Defendant.</b>	)
26	)
27	)
28	)

1 Plaintiffs Marc Ginsberg and the Coalition for a Safer Web  
2 (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously  
3 sued as Google Inc. (“Google”), jointly submit this stipulation to  
4 continue the hearing on Google’s Motion to Dismiss First Amended  
5 Complaint currently set for December 16, 2021, at 09:00 AM (ECF  
6 39).

7  
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9  
10 WHEREAS, on January 25, 2021, Plaintiffs filed their  
11 Complaint (ECF 1).

12  
13 WHEREAS, on June 8, 2021, Plaintiffs filed a First Amended  
14 Complaint in lieu of filing an opposition to Google’s Motion to Dismiss  
15 (ECF 19).

16  
17 WHEREAS, on July 13, 2021, Defendant filed a Motion to  
18 Dismiss the First Amended Complaint (ECF 23).

19  
20 WHEREAS, on August 11, 2021, in response to Plaintiffs’  
21 motion requesting an emergency continuance (ECF 26), the Court  
22 stayed the case for 30 days (to September 10, 2021) based on  
23 Plaintiff’s counsel’s health emergency.

24  
25  
26 WHEREAS, on September 14, 2021, the Court issued an order  
27 (ECF 30) extending the stay in this case through October 14, 2021.  
28

1 When the stay ended, the Parties resumed the briefing schedule  
2 related to Google's Motion to Dismiss.  
3

4 WHEREAS, on November 2, 2021, Plaintiffs filed their  
5 Opposition to Google's Motion to Dismiss (ECF 38).  
6

7 WHEREAS, on November 19, 2021, Defendant filed its Reply to  
8 the Motion to Dismiss (ECF 38).  
9

10 WHEREAS, on December 8, 2021, this Court confirmed the  
11 hearing on Google's Motion to Dismiss for December 16, 2021 at 09:00  
12 AM (ECF 39).  
13

14 WHEREAS, in response to Plaintiffs' request, Defendants  
15 consented to a joint stipulation to continue the currently set hearing  
16 on Google's Motion to Dismiss First Amended Complaint based upon  
17 the following circumstances.  
18  
19

- 20 1. As known to this Court and defense counsel, since the  
21 filing of the Complaint, Plaintiff's Counsel, Keith  
22 Altman, has been battling severe health issues  
23 impacting his vision. The onset was very quick. His  
24 condition worsened over just a few months. He is now  
25 legally blind.  
26  
27  
28

1           2. In his pursuit of tools to help accommodate his  
2  
3           situation, Keith Altman has an appointment at the  
4           University of Michigan Low-Level Vision Clinic on  
5           December 16<sup>th</sup>. This is the same date as the currently  
6  
7           set hearing. These appointments are very difficult to  
8  
9           get. It is anticipated that this appointment could last  
10          most of the day.

11          WHEREAS, the Parties understand that the Court's calendar is  
12  
13         booked through March 2022. Therefore, we ask this Court to  
14         reschedule this hearing to the next available date.

15  
16         WHEREAS, no Party will be prejudiced by this delay.

17         THE PARTIES HEREBY STIPULATE AND AGREE that,  
18  
19         subject to the Court's approval, the hearing on Google's Motion to  
20         Dismiss First Amended Complaint currently set for December 16,  
21         2021, at 09:00 AM be continued to a date to be scheduled by the  
22         Court.

23  
24  
25         Respectfully submitted,

26  
27         Dated: December 10, 2021

Law Office Of Keith Altman

28                 By: /s/ Keith Altman

Keith Altman  
*Attorney for Plaintiff*

Dated: December 10, 2021

Wilson Sonsini Goodrich & Rosati

By: /s/ Meng Jia Yang  
Meng Jia Yang  
*Attorneys For Defendant*

**SIGNATURE ATTESTATION**

I, Keith Altman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing of this e-filed document.

By: /s/ Keith Altman  
Keith Altman

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: December \_\_, 2021

\_\_\_\_\_  
Honorable Beth Labson Freeman  
United States District Court Judge